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August 17, 2020

VIA ECF

Honorable Brian M. Cogan
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Plaintiff's Request for Clarification on Court Order dated August 14
and Request for Leave to File PMC for MCCC**
Panora et al. v DEENORA CORP d/b/a Dee's et al., 19-cv-07267

Your Honor,

This office represents the Plaintiff in the above referenced matter. We sincerely apologize for not following up after the decision on the motion to dismiss to obtain leave to file the MCCC, and write to respectfully seek clarification on the court order dated August 14.

Leanghour Lim, the Associate who was working on this case, has left this firm. We have reviewed the Hearing Transcript dated February 12, 2020 in full, and our understanding from the transcript is that the judge would like to revisit the issue of the MCCC after the decision on the Motion to Dismiss/ Summary Judgment. As such, we filed our MCCC soon thereafter.

We respectfully seek clarification as to the proposed next steps to move for CCC, whether through another PMC or through a briefing schedule. If it is a PMC, we propose the following dates (which the Defendants' counsels are available on): Friday August 21, in the morning and in the later afternoon, and Tuesday, August 25, between 11:00 and 13:00. Defendants do not consent to our request for PMC.

Respectfully Submitted

/s/ John Troy
John Troy

JT/mh

cc: All Counsel of Record via ECF